

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

)	
JOSEPH ROSEMOND,)	
Plaintiff,)	
v.)	C.A. No. 04-30072-KPN
)	
STOP AND SHOP SUPERMARKET)	
COMPANY,)	
Defendant.)	
)	

**JOINT MOTION TO EXTEND SCHEDULING ORDER FOR WRITTEN
DISCOVERY ONLY**

The parties hereby move for the Court to extend the scheduling order filing deadline for written discovery from October 14, 2004 until November 5, 2004. As grounds for this motion, the parties state the following:

1. Due to difficulties in obtaining documents in response to requests for production of documents, the attorneys' trial schedules, and availability of plaintiff, the parties have been unable to schedule a date to complete plaintiff's deposition before the close of written discovery.
2. Defendant would like an opportunity to depose plaintiff prior to the close of written discovery in the event that supplemental written discovery is necessary.
3. The parties do not wish to extend any other discovery deadlines in the scheduling order.
4. The parties therefore seek an additional three-week extension of time, until November 5, 2004, of the deadline for serving written discovery.

WHEREFORE, Plaintiff and Defendant respectfully request that the Court approve their Joint Motion to Extend Scheduling Order for Written Discovery Only, with such amendments as the Court deems just and proper.

Respectfully submitted,

/s/ Tani E. Sapirstein

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